

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CASE NO.

BARBARA STINNETT,
Plaintiff,

Judge
Magistrate Judge

vs.

TRANS UNION, LLC;
EXPERIAN INFORMATION
SOLUTIONS, INC; and
EQUIFAX INFORMATION
SERVICES, LLC;
Defendants.

TRANS UNION, LLC’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the Fourth Judicial District Court, Hennepin County, Minnesota, to the United States District Court, District of Minnesota, on the following grounds:

1. Plaintiff Barbara Stinnett served Trans Union on or about January 27, 2022 with a Summons and Complaint to be filed in the Fourth Judicial District Court, Hennepin County, Minnesota. Copies of the Summons and Complaint are attached hereto, as **Exhibit A**, and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Attached hereto as **Exhibit C** is a copy of Trans Union, LLC’s Notice of Filing Notice Of Removal With the United States District Court to be filed in Hennepin

County District Court.

3. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 22-25.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

5. As of the date of this Notice of Removal, Defendants Experian Information Solutions, Inc. (“Experian”) and Equifax Information Services, LLC (“Equifax”), have been served. Counsel for Trans Union has contacted counsel and/or corporate representatives for the Defendants Experian and Equifax who have consented to this removal as evidenced by the Consents attached hereto as **Exhibit D**, and **Exhibit E**, respectively.

6. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Fourth Judicial District Court, Hennepin County, Minnesota, to the United States District Court for the District of Minnesota.

7. Notice of this removal will promptly be filed with the Fourth Judicial District Court, Hennepin County, Minnesota and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Fourth Judicial District Court, Hennepin County, Minnesota to this United States District Court, District of Minnesota.

Respectfully submitted,

Date: February 15, 2022

/s/ Bradley D. Fisher

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